



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

SOLID WASTE

December 17, 2008

Mr. Mike Gurley, Environmental Manager
Allied Waste, Atlantic Region
Lake Norman C&D Landfill Facility
5105 Morehead Road
Concord, North Carolina 28027

Subject: Permit Modification Application
Technical Review Letter
Lake Norman Landfill, Inc.
Permit No. 55-04
Lincoln County
Document ID No. 6239

Dear Mr. Gurley:

Lake Norman Landfill, Inc., an Allied Waste Company, the owner and operator of the Lake Norman C&D Landfill Facility, Permit No. 55-04, located in Lincoln County, has submitted to the Division, in accordance with the facility's requirement to comply with North Carolina Administrative Code 15 NCAC 13B .0547, the following information;

- *Initial Financial Assurance Instrument, Lake Norman C&D Facility.* Prepared for BFI – Lake Norman Landfill, Stanley North Carolina. Prepared by Lake Norman Landfill, Inc., an Allied Waste Company. June 2008. Document ID No. 4973.
- *Closure and Post-Closure Plan, Lake Norman Construction and Demolition Landfill Facility.* Prepared for BFI – Lake Norman Landfill, Stanley North Carolina. Prepared by Brown and Caldwell. October 2008. Document ID No. 6149.
- *Updated Operations Plan for the BFI – Lake Norman Construction and Demolition Landfill Facility.* Prepared for BFI – Lake Norman Landfill, Stanley North Carolina. Prepared by Brown and Caldwell. October 2008. Document ID No. 6150.

The Division has completed the technical review of the application for the modification of the Facility's permit to operate; it has been determine that additional information is required for completing the technical review. Please provide the information requested below;

2090 US Highway 70, Swannanoa, North Carolina 28778
Phone (828) 296-4500 \ FAX (828) 299-7043 \ Internet <http://wastenotnc.org>
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Application Format

1. The application cover sheet does not contain the engineer's seal in accordance with 15A NCAC 13B .0533(b)(1)(A).
2. The application cover sheet does not contain the signed and dated signature of the applicant 15A NCAC 13B .0533(b)(1)(B).
3. There is no drawing cover sheet in accordance with 15A NCAC 13B .0533(b)(3)(B).

Closure

4. The engineer did not sign the "Technical Memorandum" entitled; *Closure System Slope Stability Evaluation*.
5. The engineer did not sign the "Technical Memorandum" entitled; *Stormwater Management and Erosion and Sedimentation Control Design*.
6. Review of the closure costs for this facility indicates inconsistencies in the estimated costs. On the *Closure Construction Cost Estimate*, for the entire 31.77 acres, the closure cost comes to approximately \$45,000 per acre, however, in Table 1 *CLOSURE Financial Assurance Cost Estimate*, which deals with the operational area of 18.4 acres, the costs come to approximately \$24,000 per acre. Please review your submission for accuracy and submit the written estimates required by 15A NCAC 13B .0546(c)(1) for review.

Note: one factor, *within Table 1*, appears to be the lack of soil specified in the erosion cover, 6 inches versus the prescribed 18 inches. Another issue to be aware of is that a \$45,000 per acre closure cost is well below the average cost presented by other facilities of this type, greater detail maybe required to justify lower estimates.

Post Closure


7. Review of the post closure costs for this facility indicates the estimated costs are significantly lower than similar facilities. Please submit the written estimates required by 15A NCAC 13B .0546(c)(3) and .0546 (c)(5), for review.

Operations Plan Revisions

8. Revise section 2.1 which states that the facility will serve North Carolina. The stated service area should be the same as that stated in the permit.
9. Revise section 5.8, it should be made clear that all windblown waste is to be picked up at the end of the working day and returned to the working face per 15A NCAC 13B .0542(g)(3).
10. Section 5.15 states that at times, the facility may utilize multiple working faces. Revise the plan to indicate at each working face must be less than 1/2 acre in size.
11. Section 5.18.5 refers to multiple alternative covers available to the facility for use. The current permit indicates that there are NO alternative covers approved for this facility. Please be aware that a demonstration must be performed and approval granted by the Division prior to use of an alternative cover. The title of this section should also be changed since cover is not applied daily in the C&D landfill.

Finally should you have any questions regarding this matter you may contact me at (828) 296-4704.

Sincerely,



Larry Frost
Regional Engineer

cc: Albert Glenn – Brown and Caldwell
CT Gerstell – SWS/MRO